Ohio Environmental Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

7/22/2010

Tim Cullinan
Willoway Nurseries, Inc, Huron Greenhouse
4534 Center Road
Avon, OH 44011

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0322010283
Permit Number: P0086951
Permit Type: Renewal
County: Erie

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NWDO

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Willoway Nurseries, Inc, Huron Greenhouse

Facility ID:	0322010283
Permit Number:	P0086951
Permit Type:	Renewal
Issued:	7/22/2010
Effective:	7/22/2010
Expiration:	7/22/2020

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Willoway Nurseries, Inc, Huron Greenhouse

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Authorization

Facility ID: 0322010283
Application Number(s): A0017827
Permit Number: P0086951
Permit Description: Renewal PTIO for a 20.7 mmBtu/hr corn/wood fired boiler [B001] and a 15.97 mmBtu/hr natural gas/#2 fuel oil fired boiler [B002]
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 7/22/2010
Effective Date: 7/22/2010
Expiration Date: 7/22/2020
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Willoway Nurseries, Inc, Huron Greenhouse
4816 Cleveland Road East
Huron, OH 44839

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0086951
Permit Description: Renewal PTIO for a 20.7 mmBtu/hr corn/wood fired boiler [B001] and a 15.97 mmBtu/hr natural gas/#2 fuel oil fired boiler [B002]

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**B001**
Company Equipment ID:	Boiler 001
Superseded Permit Number:	03-17148
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B002**
Company Equipment ID:	Boiler 002
Superseded Permit Number:	03-17155
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.
The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).
The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed

permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.
If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.
You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.
You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.
Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated

[1] Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

C. Emissions Unit Terms and Conditions

1. B001, Boiler 001

Operations, Property and/or Equipment Description:

20.7 mmBtu corn and/or wood-fired primary boiler

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(3) through d)(5).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	0.32 lb particulate emissions (PE)/mmBtu and 29.0 tons PE/yr 5.6 lbs particulate matter less than 10 microns in size (PM10)/hr and 24.5 tons PM10/yr 10.1 lbs nitrogen oxides (NOx)/hr and 44.2 tons NOx/yr 12.4 lbs carbon monoxide (CO)/hr and 54.3 tons CO/yr 0.52 lbs sulfur dioxide (SO2)/hr and 2.28 tons SO2/yr 0.81 organic compounds (OC)/hr and 3.55 tons OC/yr See b)(2)a. b)(2)b. and b)(2)c.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)d.
c.	OAC rule/ 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-10	See b)(2)e.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) must be employed. For this emissions unit, BAT has been determined to be use of a multi-clone separator, and compliance with the terms and conditions of this permit.

b. The requirements of this rule also include compliance with OAC rule 3745-17-07(A).

c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective, November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the SO_2 and OC emissions from this contaminant source since the uncontrolled potential to emit for SO_2 and OC are less than ten tons per year.

e. The PE requirements established by this rule are less stringent than the requirements established under OAC rule 3745-31-05(A)(3)(a). On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by US EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the US EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once US EPA approves the December 1, 2006 version of 3745-31-05, then the requirements of OAC rule 3745-17-10(B) become effective.

c) Operational Restrictions

(1) The fuel used to fire this boiler shall be restricted to corn or wood/sawdust biomass only.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the abnormal visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item d)(1)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(2) For each day during which the permittee burns a fuel other than corn or wood/sawdust biomass, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(3) The permit to install for this emission unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the"worst case" pollutant(s):

Pollutant: hydrogen chloride (HCl)

TLV (mg/m3): 5.5

Maximum Hourly Emission Rate (lbs/hr): 0.4

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2.18

MAGLC (ug/m3): 130.95

(4) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

(5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and

b. any corrective actions taken to eliminate the visible particulate emissions.

f) Testing Requirements

(1) Compliance with the emission limitations specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations: 0.32 lb PE/mmBtu and 29.0 tons PE/yr

Applicable Compliance Method: The permittee demonstrated compliance with the lb/mmBtu limitation through testing conducted on October 28, 2008. If required, the permittee shall demonstrate compliance with the lb/mmBtu limitation through emissions testing conducted in accordance with Methods 1 – 5 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the lb PE/mmBtu limitation, the maximum heat input (20.7 mmBtu/hr), the maximum operating schedule of 8760 hours/year and 0.0005 tons/lb. Therefore, if compliance is shown with the lb PE/mmBtu limitation, compliance with the annual limitation shall be demonstrated.

b. Emission Limitations: 5.6 lbs PM10/hr and 24.5 tons PM10/yr

Applicable Compliance Method: The permittee demonstrated compliance with the hourly limitation through testing conducted on October 28, 2008. If required, the permittee shall demonstrate compliance with the hourly limitation through emissions testing conducted in accordance with Methods 1 – 4 of 40 CFR, Part 60, Appendix A and Method 201 or 201A of 40 CFR, Part 51, Appendix M.

The annual emission limitation was developed by multiplying the lbs PM10/hr limitation, the maximum operating schedule of 8760 hours/year and 0.0005 tons/lb. Therefore, if compliance is shown with the lb PM10/hr limitation, compliance with the annual limitation shall be demonstrated .

c. Emission Limitations: 10.1 lbs NOx/hr and 44.2 tons NOx/yr

Applicable Compliance Method: The permittee demonstrated compliance with the hourly limitation through testing conducted on October 28, 2008. If required, the permittee shall demonstrate compliance with the hourly limitation through emissions testing conducted in accordance with Methods 1 – 4 and 7 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the lbs NOx/hr limitation, the maximum operating schedule of 8760 hours/year and 0.0005 tons/lb. Therefore, if compliance is shown with the lb NOx/hr limitation, compliance with the annual limitation shall be demonstrated .

d. Emission Limitations: 12.4 lbs CO/hr and 54.3 tons CO/yr

Applicable Compliance Method: The permittee demonstrated compliance with the hourly limitation through testing conducted on October 28, 2008. If required, the permittee shall demonstrate compliance with the hourly limitation through emissions testing conducted in accordance with Methods 1 – 4 and 10 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the lbs CO/hr limitation, the maximum operating schedule of 8760 hours/year and 0.0005 tons/lb. Therefore, if compliance is shown with the lb CO/hr limitation, compliance with the annual limitation shall be demonstrated.

e. Emission Limitations: 0.52 lb SO2/hr and 2.28 tons SO2/yr

Applicable Compliance Method: The hourly limitation was developed by multiplying the maximum heat input rate of 20.7 mmBtu/hr by an emission factor of 0.025 lb SO2/mmBtu from AP-42, Section 1.6 (9/03). If required, the permittee shall demonstrate compliance with the hourly allowable SO2 emission limitation above in accordance with Methods 1-4 and 6 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the lbs SO2/hr limitation, the maximum operating schedule of 8760 hours/yr and 2000 lbs/ton. Therefore, if compliance is shown with the lb SO2/hr limitation, compliance with the annual limitation shall be demonstrated..

f. Emission Limitation: 0.81 lb OC/hr and 3.55 tons OC/yr

Applicable Compliance Method: The hourly limitation was developed by multiplying the maximum heat input rate of 20.7 mmBtu/hr by an emission factor of 0.039 lb OC/mmBtu from AP-42, Section 1.6 (9/03). If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with Methods 1-4 and 18,25 or 25A of 40 CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the lbs OC/hr limitation, the maximum operating schedule of 8760 hours/yr and 2000 lbs/ton.

Therefore, if compliance is shown with the lb OC/hr limitation, compliance with the annual limitation shall be demonstrated..

g. Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method: If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 (Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002.

g) Miscellaneous Requirements

(1) None.

2. B002, Boiler 002

Operations, Property and/or Equipment Description:

15.97 mmBtu/hr natural gas and number 2 fuel oil-fired boiler

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.014 lb/mmBtu and 0.92 ton per year (TPY). Organic compound (OC) emissions shall not exceed 0.011 lb/mmBtu and 0.85 TPY. Nitrogen oxides (NOx) emissions shall not exceed 0.14 lb/mmBtu and 9.88 TPY. Carbon monoxide (CO) emissions shall not exceed 0.082 lb/mmBtu and 6.46 TPY. Sulfur dioxide (SO_2) emissions shall not exceed 0.50 lb/mmBtu and 24.87 TPY. Visible particulate emissions from any stack shall not exceed 10% opacity, as a

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		six-minute average, except for one 6-minute period per hour of not more than 27% opacity. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(B) and 3745-21-08(B). This emissions unit shall not use more than 700,000 gallons of No. 2 fuel oil per year. See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)b.
d.	OAC rule 3745-18-06(D)	See b)(2)c.
f.	40 CFR, Part 60, Subpart Dc	See b)(2)b. and b)(2)d.

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of natural gas or No. 2 fuel oil, a sulfur content limitation for No. 2 fuel oil, and the emission limitations listed in term b)(1) above.

b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c. When burning No. 2 fuel oil, the emissions limitation specified by this rule is less stringent that the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

d. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency (U.S. EPA), 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency (Ohio EPA).

e. The lb/mmBtu actual heat input and tons per year emission limitations, except for SO_2, are based on the emissions unit's potentials to emit. Therefore, no monitoring, record keeping, and reporting requirements are necessary to ensure ongoing compliance with these emission limitations.

c) Operational Restrictions

(1) The permittee shall burn only natural gas and/or No. 2 fuel oil in this emissions unit.

(2) The quality of No. 2 fuel oil received for burning in this emissions unit shall have a combination of sulfur content and heat content sufficient to comply with the allowable

sulfur dioxide emission limitation of 0.50 lb/mmBtu of actual heat input and the sulfur content limitation for No. 2 fuel oil of less than or equal to 0.5 weight per cent sulfur.

(3) The maximum annual No. 2 fuel oil usage rate for this emissions unit shall not exceed 700,000 gallons per year.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lb/mmBtu). [The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)]. A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lb/mmBtu). [The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)].

c. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

(2) The permittee shall maintain monthly records of the following information:

a. The total volume of natural gas (mmft3) burned in this emissions unit.

b. The total number of gallons of No. 2 fuel oil used in this boiler for each month.

c. The total summation of the number of gallons of No. 2 fuel oil used each year.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations: PE shall not exceed 0.014 lb/mmBtu and 0.92 TPY.

Applicable Compliance Method: The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3, Table 1.3-1 (9/98). Compliance with the lb/mmBtu emission limitation may be determined by converting the 2 lbs PE/10^3 gal emission factor into lbs PE/mmBtu by dividing by 140 mmBtu/10^3 gal. Compliance with the annual emission limitation may be demonstrated by multiplying the lb PE/mmBtu value by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5.

b. Emission Limitations: OC emissions shall not exceed 0.011 lb/mmBtu and 0.85 TPY

Applicable Compliance Method: The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (7/98). Compliance with the lb/mmBtu emission limitation may be determined by converting the 11 lbs TOC/10^6 scf emission factor into lb TOC/mmBtu by dividing by 1,020 Btu/scf. Compliance with the annual emission limitation may be demonstrated by multiplying the lb TOC/mmBtu value by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 25.

c. Emission Limitations: NOx emissions shall not exceed 0.14 lb/mmBtu and 9.88 TPY.

Applicable Compliance Method: The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3, Table 1.3-1 (9/98). Compliance with the lb/mmBtu emission

limitation may be determined by converting the 20 lbs NOx/10^3 gal emission factor into lb NOx/mmBtu by dividing by 140 mmBtu/10^3 gal. Compliance with the annual emission limitation may be demonstrated by multiplying the lb NOx/mmBtu value by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 7.

d. Emission Limitations: CO emissions shall not exceed 0.082 lb/mmBtu and 6.46 TPY.

Applicable Compliance Method: The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-1 (7/98). Compliance with the lb/mmBtu emission limitation may be determined by converting the 84 lbs CO/10^6 scf emission factor into lb CO/mmBtu by dividing by 1,020 Btu/scf. Compliance with the annual emission limitation may be demonstrated by multiplying the lb CO/mmBtu value by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 10.

e. Emission Limitations: SO_2 emissions shall not exceed 0.50 lb/mmBtu and 24.87 TPY.

Applicable Compliance Method: The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3, Table 1.3-1 (9/98). Compliance with the lb/mmBtu emission limitation shall be based upon the record keeping in term d)(1). Compliance with the annual emission limitation shall be determined by multiplying the annual average lb SO_2/mmBtu value by the annual average heat content and the total gallons on No. 2 fuel oil burned, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 6.

f. Emission Limitation: Visible particulate emissions from any stack shall not exceed 10% opacity, as a six-minute average, except for one 6-minute period per hour of not more than 27% opacity.

Applicable Compliance Method: Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A.

g. Emission Limitation: This emissions unit shall not use more than 700,000 gallons of No. 2 fuel oil per year.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping requirement described in paragraph d)(2).

h. Emission Limitation: Sulfur content limitation – less than or equal to 0.5 weight percent sulfur

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping requirement described in paragraph d)(1).

g) Miscellaneous Requirements

(1) None.